

**FREDERICK W. KLEPP, ATTORNEY AT LAW  
601 LONGWOOD AVENUE  
CHERRY HILL, NEW JERSEY 08002**

**(856) 663-3344  
(856) 663-9263 - fax**

April 4, 2017

Honorable Lois H. Goodman  
United States Magistrate Judge  
United States District Court  
for the District of New Jersey  
Clarkson S. Fisher Federal Building and U.S. Courthouse  
Room 7050  
402 East State Street  
Trenton, New Jersey 08608

RE: United States v. Eric Smith, *et al.*  
Magistrate Case No.: 14-4518-2 (LHG)  
Release Modifications Motion

Dear Judge Goodman:

I was appointed under the Criminal Justice Act on May 27, 2016, to represent Eric Smith. On February 1, 2017, upon my request and after a hearing before you, you ordered that Eric Smith be released from pretrial confinement subject to certain release conditions. On March 8, 2017, you approved and ordered modifications to Eric Smith's Release Order to permit with Pretrial Services approval his travel to the Essex County Welfare Department and to his doctor's office. Please accept this letter as a motion for additional modifications to the Order Setting Conditions of Release.

Release from home detention as necessary and with the approval of the Pretrial Services Office to travel to the following offices and departments:

1. Social Security Office, 970 Broad Street, Newark, New Jersey;

2. Office of Vital Statistics, 394 University Avenue, Newark, New Jersey;
3. Motor Vehicle Commission, 228 Frelinghuysen Avenue, Newark, New Jersey;
4. Office of Social Services, 18 Rector Street, Newark, New Jersey.

I have spoken to Mr. Smith's Pretrial Services Officer, Jennifer Powers, and to Assistant United States Attorney Fabiana Pierre-Louis, Esquire, about these release modifications. Neither Ms. Powers nor Ms. Pierre-Louis has any objection to this motion. I request that the previous Order Setting Conditions of Release filed February 1, 2017, be modified to include these office and department visits.

Please advise if Your Honor has any questions regarding these release modifications request.

Respectfully,

s/Frederick W. Klepp, Esquire  
Frederick W. Klepp, Attorney for Eric Smith

Copy: Fabiana Pierre-Louis, Esquire  
Assistant United States Attorney (by efile)  
Jennifer Powers  
United States Pretrial Services Officer (by efile)  
Eric Smith (by mail)

